

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

FEDERAL TRADE COMMISSION, STATE
OF CALIFORNIA, STATE OF
COLORADO, STATE OF ILLINOIS,
STATE OF INDIANA, STATE OF IOWA,
STATE OF MINNESOTA, STATE OF
NEBRASKA, STATE OF OREGON,
STATE OF TENNESSEE, STATE OF
TEXAS, STATE OF WASHINGTON, and
STATE OF WISCONSIN,

Plaintiffs,

- against -

SYNGENTA CROP PROTECTION AG,
SYNGENTA CORPORATION,
SYNGENTA CROP PROTECTION, LLC,
and CORTEVA, INC.,

Defendants.

No. 1:22-cv-828-TDS-JEP

IN RE CROP PROTECTION PRODUCTS
LOYALTY PROGRAM ANTITRUST
LITIGATION,

No. 1:23-md-3062-TDS-JEP

STIPULATED DISCOVERY COORDINATION ORDER

WHEREAS on July 5, 2024, the Court in the above-captioned cases entered a Discovery Coordination Order (No. 1:22-cv-828, Dkt. 222; No. 1:23-md-3062, Dkt. 136) (the “July 5 Coordination Order”) directing the Parties to coordinate discovery in order to promote the efficient litigation of the related actions and minimize the burden and expense of duplicative discovery across cases; and

WHEREAS the Parties now seek to expand the discovery coordination principles established by the July 5 Coordination Order to accommodate coordination amongst the above-captioned cases and the related action pending in the United States District Court for the Eastern District of Arkansas, *State of Arkansas v. Syngenta Crop Protection AG, et al.*, No. 4:22-cv-1287-BSM (E.D. Ark.); and

WHEREAS this proposed Order is intended to supplement the July 5 Coordination Order;

THE COURT THEREFORE ORDERS AS FOLLOWS:¹

1. For purposes of this Order:
 - (a) “Arkansas Action” means *State of Arkansas v. Syngenta Crop Protection AG, et al.*, No. 4:22-cv-1287-BSM (E.D. Ark.).
 - (b) “Contact Attorneys” refers to the email distribution lists identified on Schedule A.
 - (c) “Defendants” refers collectively to Corteva, Inc. and its subsidiary Corteva Agriscience LLC (“Corteva”); and Syngenta Crop Protection AG, Syngenta Corporation, and Syngenta Crop Protection, LLC (“Syngenta”).
 - (d) “Government Action” refers to *FTC, et al. v. Syngenta Crop Protection AG, et al.*, No. 1:22-cv-00828-TDS-JEP (M.D.N.C.).
 - (e) “Government Plaintiffs” refers collectively to all plaintiffs in the Government Action.
 - (f) “MDL Action” refers to *In re Crop Protection Products Loyalty Program Antitrust Litigation*, Civil Action No. 23-md-3062-TDS-JEP, including all consolidated member cases (both current and any that may be transferred and consolidated in the future).
 - (g) “Non-Party” refers to a person or entity not a Party to any of the Related Actions.
 - (h) “Non-Party Witness” means any witness not employed by a Party and not formerly employed by a Defendant.
 - (i) “Parties” refers collectively to the parties to any Related Action.
 - (j) “Plaintiffs” refers collectively to plaintiffs in any Related Action.
 - (k) “Related Actions” means the Arkansas Action, the MDL Action, and the Government Action.

¹ This Order does not apply to the deposition(s) of any Party’s testifying expert witnesses.

(1) “Noticing Party” means a Party issuing a deposition notice, cross-notice, or subpoena or seeking a request for international judicial assistance in obtaining testimony.

2. Counsel for all Parties shall be bound by this Order.

JURISDICTION

3. The Parties agree that the Middle District of North Carolina will have sole jurisdiction over any dispute under this stipulated Order, including but not limited to those relating to deposition time or allocation of deposition hours.

COORDINATION OF DEPOSITIONS

A Noticing Party shall, within one (1) calendar day of issuing the deposition notice, subpoena, or request, and not less than fourteen (14) calendar days before the date of the deposition, provide notice to all other Parties. Other Parties shall be entitled to join or cross-notice the first Noticing Party’s notice, subpoena, or request for a deposition of a particular witness by providing notice to all Parties within ten (10) calendar days of receiving notice from the initial Noticing Party for that witness.

4. No witness deposed in any Related Action shall be deposed a second time in any Related Action, absent agreement by the witness or an order from the applicable court upon a showing of good cause.

5. A Party in any of the Related Actions may use deposition testimony taken in the other Related Actions to the extent allowed under the applicable Federal Rules of Civil Procedure or Federal Rules of Evidence.

6. All transcripts, exhibits, and (if applicable) recordings of depositions taken in one Related Action shall be made available for purchase from the relevant court reporting service to all Parties.

7. A Party may not subpoena or cross-notice a deposition noticed in a Related Action, and thus may not treat such deposition as having been obtained from discovery in that Party’s pending case, where doing so would result in exceeding that Party’s applicable discovery limits, including as established in the operative scheduling orders in the Government Action (Scheduling Order, FTC, et al. v. Syngenta Crop Protection AG, et al., No. 1:22-cv-00828-TDS-JEP (M.D.N.C.), ECF No. 195) and MDL Action (Scheduling Order, In re Crop Protection Products Loyalty Program Antitrust Litigation, No. 1:23-md-3062-TDS-JEP (M.D.N.C.), ECF No. 133).

COORDINATION OF PARTY DEPOSITIONS

8. Prior to any Plaintiff scheduling a deposition of any Defendant or current or former employee of any Defendant (a “Defendant Witness”), such Plaintiff shall notify and discuss scheduling with all other Plaintiffs with the goal of proceeding with depositions on a mutually agreeable schedule.

9. Any deposition of a Defendant Witness that is noticed or cross-noticed by Plaintiffs in two Related Actions shall be limited to eleven (11) hours of questioning time over two (2) consecutive business days. Any deposition of a Defendant Witness that is noticed or cross-noticed by Plaintiffs in all Related Actions shall be limited to fourteen (14) hours of questioning time over two (2) consecutive business days.

10. For any deposition of a Defendant Witness that is noticed by more than one Related Action Plaintiff, the noticing Plaintiffs shall endeavor to avoid duplicative questioning and limit the overall length of the deposition.²

11. For any deposition of a Defendant Witness that is noticed by Plaintiffs in more than one Related Action, the noticing Plaintiffs may agree to split questioning time and may yield any time to another Plaintiff at any time during their examination. In the event that noticing Plaintiffs are unable to agree as to the allocation of questioning time among the noticing Plaintiffs, the Government Plaintiffs shall receive seven (7) hours and each other noticing Plaintiff shall thereafter receive three (3) hours; unless the Government Plaintiffs have not noticed the deposition, in which case questioning time will be split evenly between the plaintiffs in the MDL and Arkansas Actions.

12. For any deposition of a Defendant Witness, one (1) hour of the total allotted deposition time shall be reserved for questioning by deponent's counsel.

COORDINATION OF NON-PARTY DEPOSITIONS

13. The Parties shall endeavor to ensure that depositions of Non-Party Witnesses proceed on a mutually agreeable schedule for all Parties.

14. For any deposition of a Non-Party Witness that is noticed or cross-noticed in two of the three Related Actions, the Parties agree they will not oppose an extension of the time limit of that deposition for up to eleven (11) hours of questioning time. For any deposition of a Non-Party Witness that is noticed or cross-noticed in all Related Actions, the Parties agree they will not oppose an extension of the time limit of that deposition for up to fourteen (14) hours of questioning time.

15. For any deposition of a Non-Party Witness, the Noticing Parties shall agree on an intended overall length for such deposition and inform the Non-Party Witness of any extension of time sought beyond the time limits provided for by the applicable Federal Rules of Civil Procedure. Parties shall arrive at such agreement and inform the Non-Party Witness, as applicable, in advance of such deposition. Should the Non-Party Witness object to the extension sought, and the Non-Party Witness and the Noticing Parties fail to reach an alternative agreement on a time limit for the deposition, the Non-Party Witness may seek a protective order in an appropriate court (which may include this Court). For

² For the avoidance of doubt, this provision does not represent or provide a separate or independent basis for an objection or witness instruction beyond those provided for in the Federal Rules of Civil Procedure, the Federal Rules of Evidence, or, to the extent applicable in a Related Action, the Middle District of North Carolina Local Rules or the Eastern District of Arkansas Local Rules.

the avoidance of doubt, this provision does not prevent a Party from seeking, in the course of a deposition or at the conclusion of an agreed-upon time limit, additional time beyond what may have been agreed to for good cause shown.

16. If a deposition of a Non-Party Witness is noticed or cross-noticed by at least one Defendant and at least one Plaintiff, Defendants collectively are entitled to fifty percent (50%) of the questioning time, and Plaintiffs collectively are entitled to fifty percent (50%) of the questioning time.

17. In any deposition noticed or cross-noticed by Plaintiffs in two or more Related Actions, the noticing Plaintiffs may agree to split questioning time and may yield time to another noticing Plaintiff at any time during their examination. In the event that noticing Plaintiffs are unable to agree to an allocation of questioning time, each noticing Plaintiff is entitled to an equal portion of noticing Plaintiffs' total questioning time.

18. In any deposition noticed or cross-noticed by both Syngenta and Corteva, Defendants may agree to split the Defendants' allocated questioning time and may yield any time to one another at any time during their examination. In the event that Defendants are unable to agree to the allocation of questioning time, each will be entitled to an equal portion of Defendants' total questioning time.

19. For any deposition of a Non-Party Witness that is noticed in more than one Related Action, the Noticing Parties shall endeavor to limit the overall length of the deposition.

20. For any deposition of a Non-Party Witness, any non-noticing side shall be entitled to one (1) hour of questioning time taken from the total allotted time of the deposition. The non-noticing side may continue questioning for a reasonable time beyond the one (1) hour allotted if (a) there is more than one hour remaining of the overall agreed-upon length of the deposition or, if there is not more than one hour remaining, (b) the Non-Party agrees to the additional questioning time. Additional questioning time allocated to the non-noticing side shall not exceed two (2) hours absent authorization from the Court for good cause shown.

21. Where one or more Defendants have issued a deposition notice captioned in less than all Related Actions, any amendment to expand the caption to include other Related Actions must be made within 14 days after the applicable Defendant's initial deposition notice. Amendments to notices issued prior to the date of this Order, shall be due within 14 days of entry of this Order. Upon receipt of an amended Defendant notice, impacted Plaintiffs shall have the opportunity to withdraw any previously served Plaintiff cross-notices.

COORDINATION OF DOCUMENT, DATA, AND WRITTEN DISCOVERY

22. Syngenta shall re-produce to all Parties (i) any production of Syngenta documents or data, and (ii) any written discovery responses by Syngenta in response to a request by any Plaintiff. Corteva shall re-produce to all Parties (i) any production to any Plaintiff of Corteva documents or data, and (ii) any written discovery responses by Corteva in response to a request by any Plaintiff.

23. Each Plaintiff shall re-produce to all Parties (i) any production of the applicable Plaintiff's documents or data, and (ii) any written discovery responses made by the applicable Plaintiff in response to a request by any Defendant.

24. Each Party shall promptly notify the Contact Attorneys for all other Parties of any subpoenas issued in any Related Action by that Party to any Non-Party. In the event of any productions made by that Non-Party in response to that Party's subpoena, that Party shall re-produce such production to all other Parties.³ Prior to making such re-production, the Non-Party shall be given ten (10) days' notice of its opportunity to object to such re-production. During the ten-day period, no re-production shall be made unless the Non-Party expressly agrees in writing (which may be by email) to the re-production. In the event that the Non-Party objects to re-production in writing prior to the expiration of the ten-day period, no re-production shall be made until the objection is resolved (by agreement or court order) or withdrawn. If the Non-Party does not object in writing by the end of the ten-day period, the applicable Party shall promptly reproduce the Non-Party production to all other Parties.

25. Counsel in each Related Action shall not seek to circumvent or expand upon the discovery limits applicable in each Related Action by collaborating on any written discovery requests with counsel in the other Related Actions.

³ Where a Non-Party production is made in response to more than one Party's subpoena, the reproduction obligation described in this paragraph shall lie with the Party that issued the first such subpoena.

STIPULATED AND AGREED TO BY:

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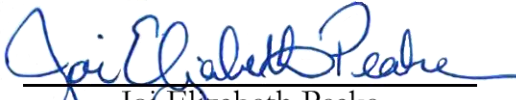
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IT IS SO ORDERED.

This, the 13th day of March, 2025.



Joi Elizabeth Peake
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